



IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED

JAN 21 2022

CON NEWBERRY, Court Clerk
STATE OF OKLAHOMA TULSA COUNTY

PRESTON KNOTT, an individual

Plaintiff

vs.

CYCLONE DRILLING INC., a foreign
Corporation and JOHN DOE,
an individual

Defendants

Case No.
CJ-2022-00209

Rebecca Brett Nightingale

PETITION

Plaintiff, Preston Knott, for his claims against the Defendants, Cyclone
Drilling Inc. and John Doe, states:

1. The actual name of "John Doe" is unknown at this time, but at
the time of the incident in question, was the agent, servant and employee of the
Defendant Cyclone Drilling Inc. and was acting within the scope of his
employment.

2. On April 17, 2021, Plaintiff was working on an oil well located near
Greenfield, OK. Plaintiff's employer, Technip FMC, was a subcontractor on the
well being drilled by Devon Energy. The Defendant, Cyclone Drilling Inc., was an
additional subcontractor on the job.



3. While working in close proximity with the Plaintiff, the Defendant, "John Doe", swung a sledge hammer striking the hand of Plaintiff causing severe damage to Plaintiff's hand.

4. The damages to Plaintiff's hand resulted from the negligence of Defendants in the following particulars:

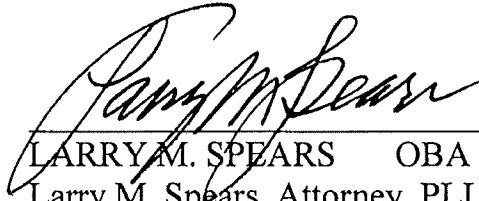
- a. Defendants created an unsafe work environment, leading to the injury of others including the Plaintiff;
- b. Defendants used the wrong procedure/method of attempting to remedy the problem in the situation complained of in Plaintiff's Petition;
- c. Defendants used the wrong equipment/tool in the situation complained of in Plaintiff's Petition; and
- d. Defendant, "John Doe", used a sledge hammer, a dangerous instrumentality, without first making sure that all persons, including the Plaintiff, were in a safe position where they would not be struck by the sledge hammer.

5. As a result of the combined negligence of the Defendants, Plaintiff suffered severe and painful injuries and has incurred and will incur medical, surgical and rehabilitation expenses. His injuries are painful, permanent and progressive, and he has lost and will in the future lose income and his earning capacity has been impaired. In total, Plaintiff has sustained damages in an amount in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code.

WHEREFORE, Plaintiff prays judgment against the Defendants, jointly and severally, in an amount in excess of the amount required for diversity jurisdiction pursuant to Section 1332 of Title 28 of the United States Code, plus interest, costs and such other relief as the Court deems just.

ATTORNEY'S LIEN CLAIMED

JURY TRIAL DEMANDED



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